

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon. Jessica S. Allen
: :
v. : Magistrate. No. 24-8198
: :
EDDIE TYREE JAMES WHITE and :
JAMES HAMMOND-SMITH : **CRIMINAL COMPLAINT**

I, Ryan Gale, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Postal Inspector with the United States Postal Inspection Service, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof.

/s/ Ryan Gale
Postal Inspector Ryan Gale
U.S. Postal Inspection Service

Postal Inspector Ryan Gale attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 17th day of September, 2024

/s/ Jessica S. Allen
Hon. Jessica S. Allen
United States Magistrate Judge

ATTACHMENT A

Count 1

(Robbery of Mail, Money, or Other Property of the United States)

On or about November 28, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendants,

**EDDIE TYREE JAMES WHITE
JAMES HAMMOND-SMITH**

did assault Victim-1, a person having lawful charge, custody, and control of United States mail matter, money, and other property of the United States, with intent to rob, steal and purloin said mail matter, money and other property of the United States, and did rob and attempt to rob Victim-1 of mail matter, or of any money, or other property of the United States

In violation of Title 18, United States Code, Sections 2114(a) and 2.

Count 2

(Theft a Postal Key)

On or about November 28, 2022, in Essex County, in the District of New Jersey, and elsewhere, defendant,

EDDIE TYREE JAMES WHITE

did steal and purloin a key suited to locks adopted by the Postal Office Department and the Postal Service and in use on authorized receptacles for the deposit of mail matter.

In violation of Title 18, United States Code, Section 1704.

Count 3

(Theft of Mail)

Between in and around December 2022 and November 2023, in Essex County, in the District of New Jersey, and Elsewhere, defendant,

EDDIE TYREE JAMES WHITE

did steal and take from and out of an authorized depository for mail matter letter, postal card, package, bag, and mail, and did abstract and remove from such letter, package, bag, or mail, an article or thing contained therein,

In violation of Title 18, United States Code, Section 1708.

ATTACHMENT B

I, Ryan Gale, am a Postal Inspector with the United States Postal Inspection Service. The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including documents and physical evidence. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At all times relevant to this Complaint:

- a. "Victim-1" was a mail carrier for the United States Postal Service ("USPS") and was a person having lawful charge, control, or custody of any mail matter or of any money or other property of the United States.
- b. An "Arrow Key" is a universal key used by USPS employees to open various mail receptacles within a designated geographic area.
- c. "Application-1" was an encrypted messaging application.

2. Law enforcement was notified of an armed robbery (the "Robbery") of Victim-1, a United States Postal Service mail carrier, on or about November 28, 2022, at a location in Newark, New Jersey (the "Robbery Location").

3. On or about November 28, 2022, at approximately 2:40 p.m., a male subject—later identified as WHITE—approached Victim-1 while she was in her USPS vehicle at the Robbery Location. WHITE lifted his shirt to display the handle of firearm in his waistband and demanded Victim-1's Arrow Key. Victim-1 provided WHITE with the Arrow Key and observed the subject flee on foot.

4. Video footage captured from multiple vantage points in the vicinity of the robbery obtained and reviewed by law enforcement, collectively depicts the following sequence of events: On or about November 28, 2022, a black 2014 Jeep Cherokee with New Jersey license plate number B83PBY (the "Vehicle")—later determined to be driven by HAMMOND-SMITH—approached the Robbery Location at or around 2:24 p.m. At or around 2:25 p.m., the individual who was later identified as WHITE exited the front passenger seat. WHITE was dressed in a dark hooded sweatshirt, black pants, black shoes, gloves, and a black mask partially obscuring his face. HAMMOND-SMITH then continued driving the Vehicle in the vicinity of the Robbery Location. WHITE remained in the vicinity of the Robbery

Location until Victim-1 exited a building and entered her USPS vehicle. At or around 2:40 p.m., WHITE approached the USPS vehicle. Shortly thereafter, WHITE fled on foot. The Vehicle then drove in the same direction that WHITE fled, and then later drove away from the vicinity of the Robbery Location.

5. Law enforcement determined that the Vehicle is registered to HAMMOND-SMITH at an address determined to be HAMMOND-SMITH's home address.

6. The investigation revealed that the HAMMOND-SMITH's phone was in the vicinity of the Robbery Location when the robbery occurred. Specifically, law enforcement obtained historical cell-site data pursuant to a search warrant that showed that HAMMOND-SMITH's phone placed a call at or around 2:35 p.m. on or about November 28, 2022, which registered on a cell tower and sector in the vicinity of the Robbery Location. The timing and cell-site location associated with that call corresponds with the approximate date, time, and location that the Vehicle was captured on video surveillance footage in the vicinity of the Robbery Location.

7. The investigation also revealed phone calls between HAMMOND-SMITH and WHITE before and after the Robbery, as well as a text message from HAMMOND-SMITH to WHITE shortly before the Robbery. In particular, records obtained and reviewed by law enforcement show that HAMMOND-SMITH called WHITE on or about November 28, 2022, at approximately 2:13 p.m. and at approximately 2:15 p.m., which was approximately ten minutes before HAMMOND-SMITH's Vehicle was first observed in video footage approaching the area of the Robbery Location. Both calls went unanswered. Immediately following the second call at approximately 2:15 p.m., the HAMMOND-SMITH Device called WHITE; the call was answered and lasted five seconds. Seconds after this call, HAMMOND-SMITH texted WHITE, "Wya? I had to throw on clothes." HAMMOND-SMITH also called WHITE after the robbery at or around 5:13 p.m. This call lasted 41 seconds.

8. The investigation further revealed that HAMMOND-SMITH's phone contained notes regarding the Robbery written the same day that the Robbery occurred. Specifically, at or around 5:13 p.m. on or about November 28, 2022, several hours after the robbery, a note was created on HAMMOND-SMITH's phone stating that "Pooda robbed the post office lady." A second note was created at or about 5:15 p.m. on or about November 28, 2022, stating that "I was a accomplice to pooda Robbin [sic] the mail lady." HAMMOND-SMITH created these two notes seconds after his phone call with WHITE at or around 5:13 p.m. described in paragraph 7 above. A further review of HAMMOND-SMITH's phone showed that "pooda" was a nickname used by WHITE. On or about November 30, 2022, two days after the Robbery, HAMMOND-SMITH wrote a third note stating that "Pooda came and come to me cause street shit Marcus can't do he get too amped up."

9. The investigation further revealed that WHITE's phone, searched pursuant to a lawfully obtained search warrant, contained numerous communications, internet searches, and other material connected to the Robbery. Prior to the Robbery, WHITE exchanged several messages indicating that he wanted to obtain an Arrow Key. For example, on or about September 24, 2022, WHITE exchanged messages on Application-1 regarding postal keys. WHITE sent a message to a contact with a link to an article about stealing postal keys. Later that same day, the contact told WHITE that they informed their cousin that "u will pay 1200 for the key, so he said Monday he going to see wassup with running down on a mailman." In response, WHITE said "copyyy [sic]." This conversation was deleted from WHITE's phone but was recovered by law enforcement.

10. That same day, as outlined in the table below, WHITE sent a text message to another contact asking if they knew anyone who worked for USPS and explained that he "need[ed] the mail key" and sent a photo of a blue USPS mail receptacle.

| Date and Time Message Sent | Sent By Phone Number/ Account | Message |
|----------------------------|-------------------------------|---|
| 9/24/2022 9:37:57 AM | WHITE | yk anybody working usps? |
| 9/24/2022 9:43:12 AM | [Contact] | I can see watchu need |
| 9/24/2022 9:43:30 AM | WHITE | I need the mail key |
| 9/24/2022 9:43:41 AM | WHITE |  |
| 9/24/2022 9:43:57 AM | WHITE | to these I got a bag for em |
| 9/24/2022 9:52:06 AM | [Contact] | I'll ask |
| 9/24/2022 9:52:29 AM | WHITE | Loved "I'll ask " |

11. Days before the Robbery, between on or about November 23 and November 25, 2022, WHITE visited several websites related to crimes against USPS employees, including two press releases from United States Attorney's Offices regarding armed robberies of a USPS letter carriers. WHITE also viewed news articles regarding armed robberies of USPS mail carriers.

12. Beginning shortly after the Robbery, and for months thereafter, WHITE engaged in numerous exchanges over text messages and Application-1 with references to mail theft, arrow keys, and checks from the zip code of the Robbery Location. These messages include numerous photographs of checks and discussion of stolen checks. For example, hours after the Robbery on or about November 28, 2022, a contact sent WHITE message on Application-1 asking “u leaving tonight ?” and “we could fish tonight.” The term “fish” is a known reference to stealing mail. In response, WHITE stated that he had returned to Delaware, where he resided at the time and would return on Friday: “yeaaa I’m in de now b back on fri.”

13. Additionally, on or about December 2, 2022, WHITE sent another message to the same contact with a redacted photograph of checks and money orders. WHITE redacted some of the information on the checks, including account and routing numbers and payor information. Law enforcement recovered several photographs depicting unredacted versions of the same checks and money orders as in the redacted photograph WHITE sent. Most of checks and money orders listed payor addresses in Newark, NJ 07107 or in East Orange, NJ. The Arrow Key stolen during the Robbery opens collection boxes in zip code 07107, which borders East Orange, NJ.

14. Messages exchanged by WHITE with other individuals indicate that WHITE possessed an Arrow Key and used it to steal checks. The messages reflecting WHITE’s possession of the Arrow Key were sent only after on or about November 28, 2022.

- a. Starting on or about December 2, 2022, four days after the Robbery, WHITE engaged in an ongoing message exchange on Application-1 in which WHITE sought to be vouched as a seller of checks over Application-1. During the exchange, WHITE sent several photographs of partially redacted and unredacted checks and a stack of mail. On or about December 6, 2022, WHITE sent a photograph that included partial images of four checks, as well as an image of an arrow key, as depicted below. The USPS insignia is clearly depicted in the photograph.



- b. On or about December 6, 2022, approximately one week after the Robbery, a contact messaged WHITE on Application-1 asking him how he was obtaining “slips,” a term known to be used for checks. WHITE responded with a key emoji.

| Date and Time Message Sent | Sent By Phone Number/ Account | Message |
|----------------------------|-------------------------------|---------------------------|
| 12/6/2022 11:07:28 AM | [Contact] | How u b gettin em slips ? |
| 12/6/2022 3:06:24 PM | WHITE | |

- c. On or about December 31, 2022, a contact messaged WHITE on Application-1 and asked when he started selling “glass,” a term known to mean checks.

| Date and Time Message Sent | Sent By Telegram User | Message |
|----------------------------|-----------------------|-------------------------------|
| 12/31/2022 10:35:14 AM | [Contact] | when u start selling glass |
| ... | ... | ... |
| 12/31/2022 10:37:20 AM | WHITE | I started after I got the key |

- d. Months later, on or about September 1, 2023, WHITE messaged another contact about whether that person dealt with checks. After that contact answered in the affirmative, WHITE indicated that he had access to mailboxes, as noted in the table below.

| Date and Time Message Sent | Sent By Phone Number/ Account | Message |
|----------------------------|-------------------------------|------------------|
| 9/1/2023 10:43:05 AM | WHITE | I got blue boxes |
| 9/1/2023 10:43:13 AM | WHITE | |

15. WHITE also used his phone to conduct searches about the Robbery shortly after it occurred. For example, between on or about November 29 and November 30, 2022, days after the Robbery, WHITE visited the Newark, NJ police website and news articles about armed robberies of postal carriers.

16. WHITE’s browser history shows that WHITE conducted internet searches regarding postal robberies, the zip code of the robbery, and USPS data. For example, WHITE searched for “newark nj usps robbery,” “newark nj usps carrier robbed,” “usps robbery arrested,” and “new jersey usps key robbery.” WHITE also searched for details about the USPS including “who in usps has a

master key,” “USPS outfit,” “usps arrow keys,” and “are there cameras on usps van?” WHITE also conducted numerous searches for locations of USPS collection boxes in the specific zip code where the Robbery occurred including “newark 07107 collection box,” “usps collection box roseville newark 07107,” and “all collection boxes in 07107.” WHITE also searched “hos [sic] to delete [Application-1]” over which WHITE had communicated his check theft and Arrow Key possession. WHITE also searched for the specific name of the building in front of which the Robbery had occurred.